## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

HRATCH Y. BABIKIAN,	)
Plaintiff,	) Case No. 02 CV 3861
v.	)
EQUIFAX INFORMATION SERVICES, L.L.C., et. al.,	)
Defendants.	) )

## JOINT MOTION FOR CONTINUANCE OF DISCOVERY AND DISPOSITIVE MOTIONS DEADLINES

NOW COME defendants Equifax Information Services L.L.C. ("EIS") and Equifax Inc., (collectively referred to herein as "defendants" and/or "Equifax") joined by all parties to this action, and move the Court to amend the Scheduling Order and extend the discovery and motions deadlines, showing good cause as follows:

- The discovery period in this case is scheduled to end on May 18, 2003.
   Dispositive motions are due June 6, 2003. Responses to dispositive motions are due on July 1, 2003.
- 2. However, the case has been referred to Magistrate Judge Welsh for a settlement conference on June 9, 2003.
- 3. The parties wish to avoid the time and expense involved in preparing motions and taking the remaining depositions if the case can be resolved in a settlement conference.
- 4. The parties request that the pending deadlines be extended as follows: All discovery of any kind to be commenced in time to be completed by **June 30, 2003**. All

dispositive motions due by July 14, 2003. Responses to dispositive motions due by

## August 11, 2003.

5. The parties stipulate that this Joint Motion be executed via facsimile on multiple signature pages.

Respectfully submitted, this \_\_\_\_ day of May, 2003,

**EQUIFAX INFORMATION SERVICES** LLC and EQUIFAX INC.

By:

One of their Attorneys Lewis P. Perling, Esq. Kilpatrick Stockton LLP 1100 Peachtree Street, Suite 2800 Atlanta, Georgia 30309 (404) 815-6500

Joined by:

James A. Francis, Esq. Mark D. Mailman, Esq. Francis & Mailman, P.C. Land Title Building, 19th Floor 100 South Broad Street Philadelphia, PA 19110 Attorneys for Plaintiff

Robert J. Dougher, Esq. George S. Bodnack, Esq. DeRESPINO & DOUGHER, P.C. 1818 Market Street, Suite 3120 Philadelphia, PA 19103 Attorneys for First Union National Bank, Wachovia Bank, NA, First Union Bank, Wachovia Corp., and First Union Nation

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Plaintiff, v. EQUIFAX INFORMATION SERVICES, L.L. et. al., Defendants.	Case No. 02 CV 3861 ) ) ) C., ) ) )
ORDE For good cause shown, IT IS HEREBY	
Continuance is hereby granted and that: all dis	covery of any kind shall be commenced in
time to be completed by June 30, 2003; all dis	positive motions are due by <b>July 14, 2003</b> ;
and, responses to dispositive motions due by $\underline{\underline{\mathbf{A}}}$	ugust 11, 2003.  udge, United States District Court
DATED:, 2003	

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